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August 21, 2014

Arlene S. Zwilling  
Assistant County Attorney  
H. Lee Dennison Building  
100 Veterans Memorial Highway  
Hauppauge, New York 11788


**Re: Franqui, et al. v. County of Suffolk et al.,  
CV-13-5943**

Dear Ms. Zwilling,

Thank you for your follow-up to our August 15, 2014 telephone conversation. As to the documents you listed, I wanted to reiterate what was discussed in our telephone conversation. The documents we requested are very specific, and are not duplicative of other documents either previously requested or previously provided.

- a. Although we have the final report by the Suffolk County Medical Examiner, as we informed you, we want to look through the rest of the file – including but not limited to all photos, none of which are included in the final report, as well as all notes, memos, and draft reports. (Demand 2 ¶ 19). As per our conversation, please advise as soon as possible when we can visit the Medical Examiner's office to review the file.
- b. Because we received Officer Grenia's memo book page for January 23, 2013 during her deposition, the Third Demand, which was prepared following her deposition, only requests the production of her memo book page for January 24, 2013, and April 9, 2013. (Demand 3 ¶ 4).
- c. We are looking for the CAD report for January 23, 2013 from when Officer Grenia was dispatched to respond to Cordwood, up until and including the time Jack Franqui was brought to the Seventh Precinct. The CAD report we have starts with Officer Grenia identifying Jack Franqui's license plate, and ends with correspondence regarding his dog while still at the scene.
- d. The recordings of the radio transmissions we have are for the same time frames as the CAD report listed above. The Second Demand specifically requested the recordings of the radio transmissions from when Officer Grenia responded to the scene, and from when Jack Franqui was placed under arrest, which we have not received to date. (Demand 2 ¶ 1).

Sincerely,

  
Mirel Fisch, Esq.